

## Ninilchik Traditional Council P.O. Box 39070

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May 1, 2017

Chairman Ajit Pai Commissioner Mignon Clyburn Commissioner Michael O'Rielly Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, DC 20554

Re: Rural Health Care Support Mechanism, WC Docket No 02-60 Actions to Accelerate Broadband-Enabled Health Care Solutions, GN Docket No 16-46

## Dear Chairman Pai and FCC Commissioners:

Thank you for your support of the Rural Health Care Program. As you recognized in a recent Senate Commerce Committee FCC Oversight hearing, broadband telemedicine is a critical component of addressing the health care needs of Alaskans.

Telemedicine has allowed us to dramatically improve access to care, accelerate diagnosis and treatment, avoid unnecessary medivacs and expand local treatment options. It has also helped reduce Medicaid costs.

The Ninilchik Traditional Council Community Clinic, the primary care facility for the rural village of Ninilchik, appreciates the opportunity to utilize the telehealth services that dramatically improve access to care, accelerate diagnosis and treatment, enable video conferencing for remote consultation with patients, as well as ability to improve the VMware infrastructure between facilities. We recognize the increased need for affordable broadband telehealth services in rural Alaska, as it has certainly enhanced our capability to provide better healthcare service to our rural residents.

However, the current \$400 million Rural Health Care Universal Service Support budget remains at the initial level set in 1997, despite inflation, advances in technology, and increased demand for services. The Universal Service Administrative Co. also recently announced that it exceeded the funding cap for the current 2016 fiscal year ending June 30, 2017. Applicants that filed

during the Sept. 1 - Nov. 30, 2016 filing window will receive a pro-rated percentage, 92.5 percent, of the qualifying funding requested. In our case, that means we will be responsible for paying an additional costs, which we did not budget or anticipate, in addition to the portion of the rate of services that we are already responsible for paying under the rules of the rural health care support mechanism.

We ask that you take steps to ensure both the near and long-term viability of the Rural Health Care Program to meet the increased demand for telemedicine services both in Alaska and across the country. We believe that the FCC should increase the budget for the rural health care support mechanisms to reflect inflation over the past two decades, as well as increased technology and telecommunications demands due to our HIPAA legal obligations, advances in telemedicine capabilities, changes in patient expectations and standards of care, and new demands from skilled nursing facilities.

In addition, please consider implementing an inflation adjustment mechanism for the future, and short-term measures to restore qualifying funding requests filed Sept. 1 - Nov. 30, 2016 to 100 percent.

Thank you for your support of this important program.

Respectfully,

Ivan Z. Encelewski

**NTC Executive Director** 

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CC:

The Honorable Senator Murkowski
The Honorable Senator Sullivan
The Honorable Congressman Young